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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY.

Debtors.

- Affects PG&E Corporation
 - Affects Pacific Gas and Electric Company
 - Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

REORGANIZED DEBTORS' REPORT ON RESPONSES TO ELEVENTH THROUGH SEVENTEENTH OMNIBUS OBJECTIONS TO CLAIMS AND REQUEST FOR ORDERS BY DEFAULT AS TO UNOPPOSED OBJECTIONS

[Re: Dkt. Nos. 9061, 9064, 9067, 9070, 9073,
9076, 9078]

**Resolving Objections Set for Hearing
October 28, 2020 at 10:00 a.m. (Pacific Time)**

REQUEST FOR ENTRY OF ORDER BY DEFAULT

PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Dkt No. 1996] (“**Case Management Order**”), that the Court enter orders by default on the following omnibus claims objections: (i) the *Reorganized Debtors’ Eleventh Omnibus Objection to Claims (Amended and Superseded Claims)* [Docket No. 9061] (the “**Eleventh Omnibus Objection**”); (ii) the *Reorganized Debtors’ Twelfth Omnibus Objection to Claims (Duplicative Claims)* [Docket No. 9064] (the “**Twelfth Omnibus Objection**”); (iii) the *Reorganized Debtors’ Thirteenth Omnibus Objection to Claims (Incorrect Debtor Claims)* [Docket No. 9067] (the “**Thirteenth Omnibus Objection**”); (iv) the *Reorganized Debtors’ Fourteenth Omnibus Objection to Claims (Books and Records Claims)* [Docket No. 9070] (the “**Fourteenth Omnibus Objection**”); (v) the *Reorganized Debtors’ Fifteenth Omnibus Objection to Claims (Satisfied Claims)* [Docket No. 9074] (the “**Fifteenth Omnibus Objection**”); (vi) the *Reorganized Debtors’ Sixteenth Omnibus Objection to Claims (Satisfied Claims)* [Docket No. 9076] (the “**Sixteenth Omnibus Objection**”); and (vii) the *Reorganized Debtors’ Seventeenth Omnibus Objection to Claims (Satisfied Claims)* [Docket No. 9078] (the “**Seventeenth Omnibus Objection**,” and, collectively, the “**Omnibus Objections**”).

RELIEF REQUESTED IN THE OMNIBUS OBJECTIONS

The Omnibus Objections seek to disallow and expunge the Proof(s) of Claim listed in the column headed “Claims to be Disallowed and Expunged” in Exhibit 1 to each Omnibus Objection.

NOTICE AND SERVICE

The Reorganized Debtors filed a Notice of Hearing with respect to each Omnibus Objection [Docket Nos. 9063, 9066, 9069, 9072, 9075, 9079, and 9079]. The Omnibus Objections also were supported by the respective declarations of Robb McWilliams [Docket Nos. 9062, 9065, 9068, 9071, and 9074]. The Omnibus Objections, the Notices of Hearing, and the Declarations were served as

described in the *Certificate of Service of Andrew G. Vignali*, filed on September 28, 2020 [Docket No. 9159] (the “**Certificate of Service**”). As further described in the Certificate of Service, on September 21, 2020, the Claimants associated with each Proof of Claim listed on Exhibit 1 to the Omnibus Objections received a notice customized to include the claim number, debtor, claim amount and priority, and the basis for objection of the disallowed claim, and claim number and claim amount and priority of the surviving claim for each counterparty.

The deadline to file responses or oppositions to the Omnibus Objections has passed. The Reorganized Debtors have received the following formal and informal responses:

Docket No.	Claimant	Claim No.	Resolution
Eleventh Omnibus Objection			
Informal	Cedar Glade Capital, LLC	2492 2980	The Eleventh Omnibus Objection is WITHDRAWN with respect to this Claim.
Informal	Cedar Glade LP, as Assignee of Fair Harbor Capital LLC (Way Mar)	64216	The Eleventh Omnibus Objection is WITHDRAWN with respect to this Claim.
Informal	Shaw Pipeline, Inc.	1369	The Eleventh Omnibus Objection is WITHDRAWN with respect to this Claim.
Informal	SEL Engineering Services, Inc.	2905	The Eleventh Omnibus Objection is WITHDRAWN with respect to this Claim.
Informal	W K McLellan	3011	The Eleventh Omnibus Objection is WITHDRAWN with respect to this Claim.
Twelfth Omnibus Objection			
Informal	G4S Secure Integration LLC	68985 59275	By agreement with the Claimant, Claim No. 68985 will be disallowed and expunged, and Claim No. 59275 will survive.
Informal	VonWin Capital Management, L.P. as Transferee of Golder Associates, Inc.	79082	The Twelfth Omnibus Objection is WITHDRAWN with respect to this Claim.
Thirteenth Omnibus Objection			
Informal	G4S Secure Solutions (USA) Inc.	70406 71836	By agreement with the Claimant, Claim No. 71836 will be disallowed and expunged, and Claim No. 70406 will survive.

Docket No.	Claimant	Claim No.	Resolution
Fourteenth Omnibus Objection			
Informal	Nuance Communications	60467	By agreement with the Claimant, Claim No. 60467 will be disallowed.
Informal	Robert Vogel	2859	<p>The Reorganized Debtors are attempting to resolve this matter consensually, but have not yet reached a resolution. The Reorganized Debtors' counsel proposed continuing the objection to the next omnibus hearing, but have not yet heard back from Claimant.</p> <p>If necessary, the Reorganized Debtors are prepared to address the Fourteenth Omnibus Objection with respect to this Claim at the hearing.</p>
Informal	Nusura Inc.	92185288	The Reorganized Debtors are attempting to resolve this matter consensually. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on November 17, 2020, at 10:00 a.m.
Informal	Clean Energy	61471	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to November 11, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on November 17, 2020, at 10:00 a.m.
Informal	Davey Tree Surgery Company	80316 80318 80427 80460 80479 80474	The Fourteenth Omnibus Objection is WITHDRAWN with respect to these Claims.
Informal	Davey Resource Group, Inc.	80405 80316	The Fourteenth Omnibus Objection is WITHDRAWN with respect to these Claims.

Docket No.	Claimant	Claim No.	Resolution
1 2 3 4 5 6	Informal KDTV, KABE, KUVS, KMEX, KTFF, KFTR, KFTV, KBTF Television	588	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to November 2, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on November 17, 2020, at 10:00 a.m.
7 8 9 10 11	Informal Little Diversified Architectural Consulting, Inc.	8630	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to November 3, 2020. The objection will be continued to the next omnibus hearing, on November 17, 2020, at 10:00 a.m.
12 13	Informal Yuba County Water Agency	92185664	The Fourteenth Omnibus Objection is WITHDRAWN with respect to this Claim.
14 15 16 17 18 19 20 21 22	Informal Dun & Bradstreet	2929	The Reorganized Debtors are attempting to resolve this matter consensually, but have not yet reached a resolution. The Reorganized Debtors' counsel proposed continuing the objection to the next omnibus hearing, but have not yet heard back from Claimant. If necessary, the Reorganized Debtors are prepared to address the Fourteenth Omnibus Objection with respect to this Claim at the hearing.
23	9315 VonWin Capital Management LP	2251	The Fourteenth Omnibus Objection is WITHDRAWN with respect to this Claim.
24 25 26 27 28	9316 Sequoia Engineering & Design Associates	73323	The Reorganized Debtors are attempting to resolve this matter consensually and are further researching this Claim. The objection will be continued to the next omnibus hearing, on November 17, 2020, at 10:00 a.m.

Docket No.	Claimant	Claim No.	Resolution
Informal	Bureau of Land Management	92183647	The Reorganized Debtors are attempting to resolve this matter consensually. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on November 17, 2020, at 10:00 a.m.
Informal	U.S. Forest Service	92185206	The Reorganized Debtors are attempting to resolve this matter consensually. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on November 17, 2020, at 10:00 a.m.
Informal	RiverPark Strategic Income Fund	3828	The Reorganized Debtors are attempting to resolve this matter consensually. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on November 17, 2020, at 10:00 a.m.
Informal	ICF Jones & Stokes, Inc.	3390	The Fourteenth Omnibus Objection is WITHDRAWN with respect to this Claim.
Fifteenth Omnibus Objection			
Informal	Desert Sunlight 300, LLC	53822	The Fifteenth Omnibus Objection has been WITHDRAWN with respect to this Claim. <i>See Docket No. 9124.</i>
Informal	FPL Energy Montezuma Wind, LLC	55171	The Fifteenth Omnibus Objection has been WITHDRAWN with respect to this Claim. <i>See Docket No. 9124.</i>
Informal	Genesis Solar, LLC	54681	The Fifteenth Omnibus Objection has been WITHDRAWN with respect to this Claim. <i>See Docket No. 9124.</i>
Informal	North Sky River Energy, LLC	54712	The Fifteenth Omnibus Objection has been WITHDRAWN with respect to this Claim. <i>See Docket No. 9124.</i>
Informal	Shafter Solar, LLC	30973	The Fifteenth Omnibus Objection has been WITHDRAWN with respect to this Claim. <i>See Docket No. 9124.</i>

Docket No.	Claimant	Claim No.	Resolution
1 2 3	Informal Vasco Winds, LLC	54685	The Fifteenth Omnibus Objection has been WITHDRAWN with respect to this Claim. <i>See Docket No. 9124.</i>
4 5	Informal Liberty Utilities (CalPeco Electric) LLC	2670	The Fifteenth Omnibus Objection is WITHDRAWN with respect to this Claim.
6 7 8 9 10	Informal Halkirk I Wind Project LP	20020	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to October 28, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on November 17, 2020, at 10:00 a.m.
11 12 13 14	9255 Solano Irrigation District	1952	The Reorganized Debtors are attempting to resolve this matter consensually. The objection will be continued to the next omnibus hearing, on November 17, 2020, at 10:00 a.m.
15 16 17 18 19	Informal Arlington Wind Power Project LLC	67787	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to November 2, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on November 17, 2020, at 10:00 a.m.
20 21 22 23 24	Informal Rising Tree Wind Farm II LLC	67086	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to November 2, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on November 17, 2020, at 10:00 a.m.
25 26 27 28	9316 Sequoia Engineering & Design Associates	75013	The Claimant has agreed to withdraw its Response. Accordingly, the Fifteenth Omnibus Objection should be SUSTAINED with respect to this Claim.

Docket No.	Claimant	Claim No.	Resolution
Informal	United Rentals, Inc.	80405	The Fifteenth Omnibus Objection is WITHDRAWN with respect to this Claim.
Sixteenth Omnibus Objection			
Informal	Fair Harbor Capital, LLC (as transferee of Barrier1 Systems Inc.)	92183738	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to November 2, 2020, and a continuance of the hearing on the objection to the next omnibus hearing, on November 17, 2020, at 10:00 a.m.
Informal	Fair Harbor Capital, LLC (as transferee of Josephine Lucero)	92178451	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to November 2, 2020, and a continuance of the hearing on the objection to the next omnibus hearing, on November 17, 2020, at 10:00 a.m.
Informal	Vendor Recovery Fund IV, LLC (as transferee of Conde Group Inc.)	92185960	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to November 3, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on November 17, 2020, at 10:00 a.m.
Informal	City of Oakland	92185159	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to October 28, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on November 17, 2020, at 10:00 a.m.

Docket No.	Claimant	Claim No.	Resolution
Seventeenth Omnibus Objection			
Informal	Mark Cameron	92178532 92178533	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to November 3, 2020. The objection will be continued to the next omnibus hearing, on November 17, 2020, at 10:00 a.m.
Informal	U.S. Fish and Wildlife Service	92186853	The Reorganized Debtors are attempting to resolve this matter consensually. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on November 17, 2020, at 10:00 a.m.
9304	South San Joaquin Irrigation District (Tri-Dam Project)	92185103	Claimant does not oppose the disallowance of this Claim, but reserves all rights with respect to Claim Nos. 70439 and 98548 and the <i>South San Joaquin Irrigation District's (A) Objection to Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization Dated March 16, 2020 as Amended [Docket no. 6320] and (B) Objection to Cure Amounts and Other Matters Pertaining to Assumption Pursuant to Section 365(B)(1) of the Bankruptcy Code [Docket No. 7037]</i> [Docket No. 7265].
9291	City and County of San Francisco on behalf of the San Francisco Public Utilities Commission	92185416	Claimant does not object to the disallowance and expungement of this Claim, but reserves all rights with respect to Claim No. 64146.

DECLARATION OF NO OPPOSITION RECEIVED

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

- I am an attorney with the law firm of Keller Benvenutti Kim LLP, co-counsel for the Reorganized Debtors

2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that no responses have been filed with respect to the Omnibus Objections except as described herein.

3. This declaration was executed in San Francisco, California.

WHEREFORE, the Reorganized Debtors hereby request entry of Orders by default (i) disallowing and expunging the Proofs of Claims listed in the column headed “Claims to be Disallowed and Expunged” in **Exhibit 1** to this Request, which listed Claims are identical to those listed in Exhibit 1 to the Omnibus Objections, except as otherwise discussed above, and (ii) granting the Reorganized Debtors such other relief as may be just and proper.

Dated: October 23, 2020

KELLER BENVENUTTI KIM LLP

By: /s/ Dara L. Silveira
Dara L. Silveira

Attorneys for Debtors and Reorganized Debtors